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February 21, 2024

Honorable Arun Subramanian
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

VIA ECF

Re: United States v. Avraham Eisenberg
23 Cr. 10 (AV)

Dear Judge Subramanian:

Defendant Avraham Eisenberg's ("Eisenberg") response to the government's Motion to Exclude Expert Testimony (Doc 80) is due this Friday, February 23, 2024. The response is nearly complete but we have been unable to meet with Eisenberg to discuss the response at the Metropolitan Detention Center ("MDC") due to a total lock down at the facility that commenced yesterday, has extended through today and seems to be set to last for some time. The MDC website currently has a banner, in red, at the top of the home page that states, "All visiting at this facility has been suspended until further notice."

For this reason, Eisenberg respectfully requests that the filing extension be extended to Monday, February 26, 2024. If we are unable to meet with Eisenberg over the weekend or are not provided sufficient time to discuss the motions with him due to a backlog in visiting caused by the lockdown or insufficient staffing, we will apply for another brief extension on Sunday.

The government, by Assistant United States Attorney Peter Davis, consents to this application. Thank you for Your Honor's consideration of this request.

Very truly yours,

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Sanford Talkin

cc: AUSA Thomas Burnett (by ECF)
AUSA Peter Davis (by ECF)
AAG Tian Huang (by ECF)